UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK CHEVRON CORPORATION.

Plaintiff,

v.

: 11 Civ. 0691 (LAK)

STEVEN DONZIGER, et al.,

Stipulation and [Proposed] Order

ELECTRONICALLY FILED

DATE FILED:

Defendants.

WHEREAS, Non-Party Patricio Salazar Cordova ("Salazar") filed a motion to quash Plaintiff Chevron Corporation's subpoena duces tecum and subpoena ad testificandum on October 2, 2019 [Dkt No. 2348];

WHEREAS, pursuant to the Court's Order, Chevron's opposition to the motion to quash was due on October 18, 2019;

WHEREAS, the Court's electronic filing system was experiencing an outage at the time Chevron's opposition was due remained unavailable until October 20, 2019;

WHEREAS, accordingly, Chevron served Salazar's counsel of record with its motion papers via email at 12:01 AM on October 19, 2019;

WHEREAS, Chevron filed its opposition through the Court's electronic filing system when the system became available again on October 20, 2019;

WHEREAS, the deadline for Salazar to file his reply in support of his motion is currently due on Monday, October 21, 2019;

WHEREAS, in light of the complexity of the issues raised in Chevron's opposition, and that, pursuant to the Local Rules, Salazar would have one business day to prepare and file his reply;

IT IS HEREBY STIPULATED AND AGREED between the parties and their undersigned counsel:

- The time for Salazar to file his reply memorandum of law in support of his motion to quash the subpoenas shall be extended to and including October 23, 2019.
 - 2. Salazar stipulates that the service of Chevron's opposition shall be deemed timely.

Dated: October 20, 2019 New York, NY

By: BAILEY DUQUETTE P.C.

/s/ James D. Bailey_

James D. Bailey 104 Charlton St., #1W New York, NY 10014 (917) 797-5948 james@baileyduquette.com Attorneys for Salazar

By: GIBSON, DUNN & CRUTCHER LLP

/s/ Andrea E. Neuman

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IT IS SO ORDERED.

Dated:

HON LEWIS KAPIAN, U.S.D.I